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21 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

22 ORACLE USA, INC., a Colorado corporation;  
ORACLE AMERICA, INC., a Delaware  
23 corporation; and ORACLE INTERNATIONAL  
CORPORATION, a California corporation,

24 Plaintiffs,

25 v.

26 RIMINI STREET, INC. , a Nevada corporation;  
27 SETH RAVIN, an individual,

28 Defendants.

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Case No. 2:10-cv-0106-LRH-PAL

**DEFENDANTS' MOTION TO FILE  
TRIAL BRIEF UNDER SEAL**

1 Pursuant to the Stipulated Protective Order governing confidentiality of documents,  
2 (Protective Order, ECF No. 55), Local Rule 10-5(b), and Rules 5.2 and 26(c) of the Federal Rules of  
3 Civil Procedure, Defendants Rimini Street, Inc. and Seth Ravin (“Rimini”) move for leave to file  
4 portions of their trial brief under seal.

5 On September 9, 2015, and in conjunction with this motion, Rimini filed a public, redacted  
6 version of the trial brief. (ECF No. \_\_\_\_). Rimini also filed a separate, unredacted sealed version  
7 with the Court.

8 The Court has “broad latitude” under Rule 26(c) “to prevent disclosure of materials for many  
9 of information, including, but not limited to, trade secrets or other confidential research,  
10 development, or commercial information.” *Phillips v. Gen. Motors Corp.*, 307 F.3d 1206, 1211 (9th  
11 Cir. 2002) (citations omitted). Rimini requests that the Court seal the redacted portions of the trial  
12 brief, because these redactions conceal information regarding Oracle’s contact with Rimini’s  
13 customers and portions of Oracle’s expert reports. Oracle has designated this material as Highly  
14 Confidential under the protective order.

15 This request is narrowly tailored. Rimini seeks leave to seal only the redacted portions of the  
16 trial brief. Thus, the public retains access to all portions of the brief, except the documents and  
17 information that the parties have designated Highly Confidential under the stipulated protective  
18 order. (*See* ECF No. 55). Therefore, Rimini respectfully requests this Court’s leave to file the trial  
19 brief under seal.

20  
21 DATED: September 9, 2015 LEWIS & ROCA LLP  
22

23 By: /s/ W. West Allen  
24 W. West Allen

25 Attorneys for Defendants  
26 Rimini Street, Inc. and Seth Ravin  
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## CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2015, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing on the CM/ECF registrants.

/s/ Judy Estrada  
An employee of Lewis Roca Rothgerber LLP